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*Attorneys for Plaintiff SVB Financial Group*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

12                   SVB FINANCIAL GROUP, )  
13    Plaintiff, )  
14    v. )  
15                   FEDERAL DEPOSIT INSURANCE )  
16    CORPORATION, as Receiver for )  
17    Silicon Valley Bank and Silicon Valley )  
18    Bridge Bank, N.A., )  
  Defendant. )

Case No.: 5:24-cv-01321

**PLAINTIFF SVB FINANCIAL GROUP'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED**

Pursuant to Civil Local Rules 7-11, 79-5(e), and 79-5(f), Plaintiff SVB Financial Group (“SVBFG”) submits this administrative motion to file under seal its unredacted Complaint against the Federal Deposit Insurance Corporation, as Receiver for Silicon Valley Bank (“FDIC-R1”) and Silicon Valley Bridge Bank, N.A. (“FDIC-R2”). The Complaint contains information derived from materials designated “Highly Confidential” by non-party the Federal Deposit Insurance Corporation, in its corporate capacity (“FDIC-C”), pursuant to the protective order (“Protective Order”) entered in SVBFG’s Chapter 11 proceeding. (*See In re SVB Fin. Grp.*, No. 23-10367-MG (Bankr. S.D.N.Y.), ECF No. 428.) Under the Protective Order, Plaintiff shall file documents and information derived from materials designated “Highly Confidential” under conditional seal. (*See id.* at ¶ 20.) An unredacted version of the Complaint will be concurrently provided to the Court and served on Defendant. Based on the foregoing, Plaintiff moves to file the following under seal:

Document	Designating Party	Reason for Sealing
Unredacted Complaint	FDIC-C	References to materials designated “Highly Confidential” by FDIC-C

Dated: March 5, 2024

Respectfully submitted,

/s/ Robert A. Sacks

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## **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on March 5, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that on March 5, 2024, I caused the mailing of the foregoing via the United States Postal Service to the Designating Party FDIC-C.

/s/ Robert A. Sacks

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